

1 JULIA E. ROMANO (CA SBN 260857)

2 [jromano@kslaw.com](mailto:jromano@kslaw.com)

3 **KING & SPALDING LLP**

4 633 West Fifth Street, Suite 1600

5 Los Angeles, CA 90071

6 Telephone: +1 213 443 4355

7 Facsimile: +1 213 443 4310

8 Attorneys for Defendant

9 THE HOME DEPOT, INC.

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12 CHRISTOPHER BARULICH,  
13 individually and on behalf of all others  
14 similarly situated,

15 Plaintiff,

16 v.

17 THE HOME DEPOT, INC., a  
18 Delaware corporation, and GOOGLE  
19 LLC, a Delaware limited liability  
20 company,

21 Defendants.

Case No. 2:24-cv-01253

**DECLARATION OF JULIA E. ROMANO  
IN SUPPORT OF JOINT STIPULATION  
TO EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT BY MORE THAN  
30 DAYS (L.R. 8.3)**

Complaint Served: Feb. 23, 2024  
Current Deadline: March 14, 2024  
New Response Date: May 13, 2024

1 I, Julia E. Romano, declare as follows:

2 1. I am an attorney at the law firm of King & Spalding LLP and an attorney  
3 of record for The Home Depot, Inc. (“Home Depot”) in the above-captioned matter.  
4 I am licensed to practice law in the state of California and am admitted to practice  
5 before this Court. I submit this declaration in support of the Joint Stipulation to  
6 Extend Time to Respond to the Initial Complaint By More Than 30 Days (L.R. 8.3)  
7 (“Stipulation”) in compliance with this Court’s standing order, and make this  
8 declaration based on my personal knowledge.

9 2. On February 14, 2024, Plaintiff filed a class action complaint  
10 (“Complaint”) in this action against Google, LLC (“Google”) and Home Depot. ECF  
11 No. 1. Home Depot was served with the summons on February 22, 2024. ECF No.  
12 16.

13 3. Home Depot recently retained King & Spalding as counsel in this action.

14 4. Soon after being retained, King & Spalding reached out to counsel for  
15 Plaintiff to request a 60-day extension, to which they agreed. Counsel for Google  
16 then drafted the Joint Stipulation, which I reviewed and approved on behalf of Home  
17 Depot.

18 5. The requested extension is necessary so that Home Depot and its  
19 counsel can fully assess the claims and defenses at issue, continue investigating the  
20 facts surrounding Plaintiff’s allegations, identify the governing contractual  
21 agreements, and locate any records of Plaintiff’s alleged calls to Home Depot. The  
22 requested extension would also provide defendants time to explore consolidation of  
23 this case with *Ambriz v. Google LLC*, No. 23-cv-05437, which was filed in the  
24 Northern District of California on October 23, 2023, and is currently pending before  
25 the Honorable Rita F. Lin. The requested 60-day extension is for same the amount of  
26 time Home Depot would have had to respond to the Complaint had Plaintiff sought  
27 a waiver of service (which Home Depot would have agreed to).

1           6.     Upon being served, Home Depot diligently began its factual  
2 investigation, assessment of the claims, and coordination with Google. However,  
3 Home Depot cannot complete these steps by March 14, the current deadline to  
4 respond to the Complaint. The 60-day extension is designed to allow sufficient time  
5 to complete these steps.

6           7.     No previous extensions by either party have been sought in this case.  
7

8           I declare under penalty of perjury of the United States of America that the  
9 foregoing is true and correct.  
10

11       Dated: March 11, 2024

KING & SPALDING LLP

12  
13                               By: /s/ Julia E. Romano

14                               Julia E. Romano  
15                               Attorneys for Defendant  
16                               THE HOME DEPOT, INC.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 12, 2024

/s/ Kristine A. Forderer  
Kristine A. Forderer